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EFG Bank AG, CAYMAN BRANCH; WELLS FARGO BANK, NATIONAL ASSOCIATION, as securities intermediary for EFG BANK AG, CAYMAN BRANCH; DLP MASTER TRUST; DLP MASTER TRUST II; GWG DLP MASTER TRUST; AND GREENWICH SETTLEMENTS MASTER TRUST

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

EFG Bank AG, CAYMAN BRANCH; WELLS FARGO BANK, NATIONAL ASSOCIATION, as securities intermediary for EFG BANK AG, CAYMAN BRANCH; DLP MASTER TRUST; DLP MASTER TRUST II; GWG DLP MASTER TRUST; AND GREENWICH SETTLEMENTS MASTER TRUST,

Plaintiffs,

v.

THE LINCOLN NATIONAL LIFE INSURANCE COMPANY,

Defendant.

Case No. 2:17-cv-00817-JFW-KS

DECLARATION OF KHAI LEQUANG IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT THE LINCOLN NATIONAL LIFE INSURANCE COMPANY'S MOTION TO DISMISS WITH RESPECT TO THE WISCONSIN POLICY

Date: June 12, 2017
Time: 1:30 p.m.
Dept: Courtroom 7A
Judge: Hon. John F. Walter

DECLARATION OF KHAI LEQUANG

I, Khai LeQuang, declare and state as follows:

1. I am an active member of the State Bar of California, admitted to practice before this Court, and a partner with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel for Plaintiffs EFG Bank AG, Cayman Branch ("EFG") and Wells Fargo Bank, National Association ("Wells Fargo"), as securities intermediary for EFG (EFG and Wells Fargo together, "EFG Plaintiffs'), and Plaintiffs DLP Master Trust, DLP Master Trust II, GWG DLP Master Trust, and Greenwich Settlements Master Trust (collectively, "EAA Plaintiffs," and together with EFG Plaintiffs, "Plaintiffs"). I have personal knowledge of the facts declared herein and could testify truthfully thereto if so required.

2. I submit this declaration in support of Plaintiffs' Opposition to Defendant The Lincoln National Life Insurance Company's ("Lincoln") Motion to Dismiss With Respect to the Wisconsin Policy.

3. Attached hereto as **Exhibit A** is a true and correct copy of one of the California policies at issue in this action, which has been redacted for privacy, having a policy number JF-5510076.

4. Attached hereto as **Exhibit B** is a true and correct copy of the Wisconsin policy that is the subject of Lincoln's motion to dismiss, which has been redacted for privacy, having a policy number JP-5401907.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed May 18, 2017, at Irvine, California.

/s/ Khai LeQuang
Khai LeQuang